

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Eric Mathew Kunjappy, Debtor

**Case No. 23-02043-JAW
CHAPTER 13**

NOTICE

Debtor has filed papers with the court to incur new debt.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court grant the Motion, or if you want the court to consider your views on the Motion, then on or before 21 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
Thad Cochran U.S. Courthouse
501 E. Court St., Suite 2.300
Jackson, MS 39201

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

Thomas C. Rollins, Jr.
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Incur New Debt.

Date: July 29, 2025

Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)
The Rollins Law Firm, PLLC
P.O Box 13767
Jackson, MS 39236
601-500-5533
trollins@therollinsfirm.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Eric Mathew Kunjappy, Debtor

**Case No. 23-02043-JAW
CHAPTER 13**

MOTION TO INCUR NEW DEBT

COMES NOW, Debtor, by and through counsel, and moves this Court to allow Debtor to incur new debt, and in support thereof, would show the Court as follows:

1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on 09/05/2023.
2. Debtor is paying approximately 3.04% to General Unsecured Debts through the plan.
3. Debtor plans to attend the University of Southern Mississippi to continue his education to obtain a bachelor's degree in cybersecurity. He intends to enroll in the Fall 2025, Spring 2026, Fall 2026, and Spring 2027 semesters.
4. Debtor is currently employed as an Administrative Support IV employee with the Mississippi Department of Environmental Quality, earning approximately \$41,600 per year. By obtaining a bachelor's degree in cybersecurity, he could potentially increase his annual income to around \$90,000.
5. Debtor seeks to obtain financial aid in the amount of \$7,000.00 at an interest rate of 4.2 percent, to be disbursed in approximately \$1,750.00 increments per semester to complete his cybersecurity degree.
6. Debtor will repay this debt directly to the lender in accordance with the terms of their agreement.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MS Bar No. 103469)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., certify that an accurate copy of the Motion to Incur New Debt was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

ERIC MATHEW KUNJAPPY

CASE NO: 23-02043-JAW

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 7/29/2025, I did cause a copy of the following documents, described below,
Notice and Motion to Incur New Debt

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 7/29/2025

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. 103469

Attorney at Law

The Rollins Law Firm

702 W. Pine Street

Hattiesburg, MS 39401

601 500 5533

trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

ERIC MATHEW KUNJAPPY

CASE NO: 23-02043-JAW

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 7/29/2025, a copy of the following documents, described below,

Notice and Motion to Incur New Debt

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 7/29/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 W. Pine Street
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
NCRS ADDRESS DOWNLOAD
CASE 23-02043-JAW
SOUTHERN DISTRICT OF MISSISSIPPI
TUE JUL 29 17-6-48 PST 2025

~~EXCLUDE~~

~~(U)BANK OF AMERICA NA
PO BOX 31785~~

BANK OF AMERICA NA
PO BOX 31785
TAMPA FL 33631-3785

~~EXCLUDE~~

~~(U)MEMBERS EXCHANGE CREDIT UNION~~

VELOCITY INVESTMENTS LLC BY AIS
INFOSOURCE
4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118-7901

~~EXCLUDE~~

~~US BANKRUPTCY COURT
THAD COCHRAN US COURTHOUSE
501 E COURT STREET
SUITE 2300
JACKSON MS 39201-5036~~

BANK OF AMERICA NA
CO BANK OF AMERICA NA
PO BOX 31785
TAMPA FL 33631-3785

BANK OF AMERICA
ATTN BANKRUPTCY
4909 SAVARESE CIRCLE
TAMPA FL 33634-2413

(P)CAVALRY PORTFOLIO SERVICES LLC
500 SUMMIT LAKE DR
STE 400
VALHALLA NY 10595-2321

CAVALRY SPV I LLC AS ASSIGNEE OF
CITIBANK NATHE HOME DEPOT
PO BOX 4252
GREENWICH CT 06831-0405

CITI CARDBEST BUY
PO BOX 790040
ST LOUIS MO 63179-0040

CITIBANK
PO BOX 6497
SIOUX FALLS SD 57117-6497

CITIBANK NA
5800 S CORPORATE PL
SIOUX FALLS SD 57108-5027

DISCOVER BANK
DISCOVER PRODUCTS INC
PO BOX 3025
NEW ALBANY OH 43054-3025

DISCOVER FINANCIAL
PO BOX 30939
SALT LAKE CITY UT 84130-0939

GOLDMAN SACHS BANK USA
ATTN BANKRUPTCY
PO BOX 70379
PHILADELPHIA PA 19176-0379

GOLDMAN SACHS BANK USA
BY AIS INFOSOURCE LP AS AGENT
4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118-7901

(P)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

JOHN S SIMPSON ESQ
SIMPSON LAW FIRM PA
FOR MEMBERS EXCHANGE CREDIT UNION
PO BOX 2058
MADISON MS 39130-2058

LVNV FUNDING LLC
RESURGENT CAPITAL SERVICES
PO BOX 10587
GREENVILLE SC 29603-0587

MARCUS BY GOLDMAN SACH
ATTN BANKRUPTCY
PO BOX 45400
SALT LAKE CITY UT 84145-0400

MEMBERS EXCHANGE CREDIT UNION
CO SIMPSON LAW FIRM PA
P O BOX 2058
MADISON MS 39130-2058

NATALIE BROWN EDQ
RUBIN LUBLIN LLC
FOR BANK OF AMERICA NA
428 NORTH LAMAR BLVD SUITE 107
OXFORD MS 38655-3221

SYNCHRONY
ATTN BANKRUPTCY
PO BOX 955060
ORLANDO FL 32896-5060

SYNCHRONY BANK
BY AIS INFOSOURCE LP AS AGENT
4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118-7901

TD RETAIL CARD
ATTN BANKRUPTCY
PO BOX 100114
COLUMBIA SC 29202-3114

TD RETAIL CARD SERVICES
CO CREDITORS BANKRUPTCY SERVICE
PO BOX 800849
DALLAS TX 75380-0849

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

~~EXCLUDE~~
~~UNITED STATES TRUSTEE~~
~~501 EAST COURT STREET~~
~~SUITE 6 430~~
~~JACKSON MS 39201 5022~~

~~EXCLUDE~~
~~(D)VELOCITY INVESTMENTS LLC BY AIS~~
~~INFOCOURCE~~
~~4515 N SANTA FE AVE~~
~~OKLAHOMA CITY OK 73118 7901~~

DEBTOR
 ERIC MATHEW KUNJAPPY
 126 GREEN OAKS
 FLORENCE MS 39073-8492

~~EXCLUDE~~
~~HAROLD J BARKLEY JR~~
~~PO BOX 4476~~
~~JACKSON MS 39296 4476~~

~~EXCLUDE~~
~~THOMAS CARL ROLLINS JR~~
~~THE ROLLINS LAW FIRM PLLC~~
~~PO BOX 13767~~
~~JACKSON MS 39236 3767~~